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HOWARD J. BRAUN
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February 10, 2000

Via Hand Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204F
Washington, DC 20554
Attn: Video Services Division, Rm. 2-A665

RECEIVED
FEB 10 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

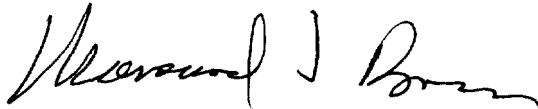
**Re: In the Matter Of Establishment
of a Class A Television Service
MM Docket No. 00-10**

Dear Ms. Salas:

There is enclosed herewith for filing an original and four copies of Joint Comments in the above-referenced proceeding.

Should there be any questions concerning the foregoing, please contact the undersigned.

Sincerely,



Howard J. Braun
Counsel for Licensees
Redwood TV Improvement Corporation
South Central Electric Association
Cooperative Television Association
Federated Rural Electric Association
Blue Earth-Nicollet-Faribault Cooperative Electric Association
Selective TV, Inc.
James Chladek

:gmd

Enclosure

cc: Hossein Hashemzadeh (By Hand Delivery w/Enclosure)
FCC Supervisory Engineer

014

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of)	
)	MM Docket No. 00-10
Establishment of a Class A)	MM Docket No. 99-292
Television Service)	RM-9260

**JOINT COMMENTS OF TV TRANSLATOR
LICENSEES AND LPTV LICENSEES**

These Comments are filed on behalf of numerous TV translator licensees and LPTV licensees ("Licensees") specified in Attachment A hereto¹ in response to the Commission's Order and Notice Of Proposed Rule Making ("NPRM") herein. Licensees urge the Commission to adopt rules to implement the Community Broadcasters Protection Act of 1999 ("CBPA") by providing meaningful Class A status to LPTV stations and to those translator stations which have made the requisite public interest showing in their previously filed eligibility statements warranting Class A permanent status. In support thereof, the following is shown:

1. Licensees have read the Comments of the Community Broadcasters Association ("CBA") the major trade association of this country's LPTV stations. In Licensees' view, CBA has shown cogent and compelling reasons why certain rules proposed in the NPRM should be adopted. In this connection, Licensees fully support and endorse CBA's views with respect to the content of the proposed new rules governing Class A status.
2. Specifically, Licensees strongly believe that certifications for Class A status should be continued to be accepted and approved by the Commission for stations beyond the existing

¹ Licensees include Redwood TV Improvement Corporation, South Central Electric Association, Cooperative Television Association, Federated Rural Electric Association, Blue Earth-

(continued)

January 28, 2000 deadline. Licensees submit that this view is consistent with the Congressional intent in adopting Section (f)(1)(B) of CBPA. For the same reasons, neither should the Commission disqualify any translator or LPTV station that was not engaging in local program originations or not meeting the other requirements of Section (f)(2)(A)(i) of CBPA by November 29, 1999.

3. Moreover, CBA's proposals for technical protection accorded to Class A stations are sound and well-reasoned. Thus, they ought to be adopted by the Commission.

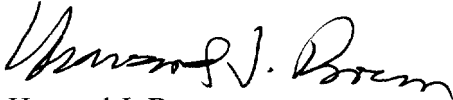
4. In sum, the enactment of CBPA by Congress is recognition that the LPTV industry has finally come of age. The hard work and local involvement of Licensees in their licensed communities and the many hundreds of similarly situated LPTV licensees who continue to serve their respective communities as outlets of local self-expression should now be acknowledged and

(continued from previous page . . .)

Nicollet-Faribault Cooperative Electric Association, Selective TV, Inc., and James Chladek.

rewarded by the Commission. Prompt implementation by the Commission of CBPA by adopting rules as proposed by CBA will help the LPTV industry to continue its meaningful contribution to the paramount public interest and promote a vibrant and burgeoning industry.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Howard J. Braun". The signature is fluid and cursive, with the first name "Howard" and last name "Braun" clearly distinguishable.

Howard J. Braun

Counsel for Licensees

Redwood TV Improvement Corporation

South Central Electric Association

Cooperative Television Association

Federated Rural Electric Association

Blue Earth-Nicollet-Faribault Cooperative Electric Association

Selective TV, Inc.

James Chladek

:gmd

Enclosure

Attachment A

<u>Licensee</u>	<u>Call Sign</u>	<u>City of License</u>
Redwood TV Improvement Corporation	K15CE	Redwood Falls, MN
Redwood TV Improvement Corporation	K17BV	Redwood Falls, MN
Redwood TV Improvement Corporation	K19CV	Redwood Falls, MN
Redwood TV Improvement Corporation	K25DN	Redwood Falls, MN
Redwood TV Improvement Corporation	K34DB	Redwood Falls, MN
Redwood TV Improvement Corporation	K39CH	Redwood Falls, MN
Redwood TV Improvement Corporation	K58AS	Redwood Falls, MN
Redwood TV Improvement Corporation	K60AO	Redwood Falls, MN
Redwood TV Improvement Corporation	K62AA	Redwood Falls, MN
Redwood TV Improvement Corporation	K66BB	Redwood Falls, MN
Redwood TV Improvement Corporation	K68BJ	Redwood Falls, MN
Redwood TV Improvement Corporation	W64AC	Redwood Falls, MN
Redwood TV Improvement Corporation	K64AC	Redwood Falls, MN
South Central Electric Association	K14DD	Frost, MN
South Central Electric Association	K14KD	Frost, MN
South Central Electric Association	K27FI	Frost, MN
South Central Electric Association	K31EF	Frost, MN
South Central Electric Association	K33EC	Frost, MN
South Central Electric Association	K36FI	Frost, MN
South Central Electric Association	K65FW	Frost, MN
Cooperative Television Association	K14KE	St. James, MN
Cooperative Television Association	K16CG	St. James, MN
Cooperative Television Association	K24CP	St. James, MN

Cooperative Television Association	K26CS	St. James, MN
Cooperative Television Association	K35DC	St. James, MN
Cooperative Television Association	K38CD	St. James, MN
Cooperative Television Association	K40BU	St. James, MN
Cooperative Television Association	K42AV	St. James, MN
Cooperative Television Association	K44AD	St. James, MN
Cooperative Television Association	K46AA	St. James, MN
Cooperative Television Association	K54AC	St. James, MN
Federated Rural Electric Association	K41EG	Jackson, MN
Federated Rural Electric Association	K45RH	Jackson, MN
Federated Rural Electric Association	K51EN	Jackson, MN
Federated Rural Electric Association	K57GE	Jackson, MN
Blue Earth-Nicollet-Faribault Cooperative Electric Association	K61GE	Jackson, MN
Blue Earth-Nicollet-Faribault Cooperative Electric Association	K62FH	Frost, MN
Selective TV, Inc.	K18DG	Alexandria, MN
Selective TV, Inc.	K26CL	Alexandria, MN
Selective TV, Inc.	K32EB	Alexandria, MN
Selective TV, Inc.	K36AA	Alexandria, MN
Selective TV, Inc.	K38AC	Alexandria, MN
Selective TV, Inc.	K50DB	Alexandria, MN
Selective TV, Inc.	K52DZ	Alexandria, MN
Selective TV, Inc.	K55ID	Alexandria, MN
Selective TV, Inc.	K62AU	Alexandria, MN
Selective TV, Inc.	K65HD	Alexandria, MN
Selective TV, Inc.	K67HI	Alexandria, MN

James Chladek

W31CD

Miami, FL

James Chladek

W31CF

Melbourne, FL